

James D. Weinberger (jweinberger@fzlz.com)  
Kimberly B. Frumkin (kfrumkin@fzlz.com)  
Andrew Nieten (anieten@fzlz.com)  
FROSS ZELNICK LEHRMAN & ZISSU, P.C.  
151 West 42nd Street, 17th Floor  
New York, New York 10036  
(212) 813-5900

*Counsel for Defendant Warner Bros. Entertainment Inc.  
and Third-Party Plaintiff DC Comics*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CHRISTOPHER WOZNIAK,

Plaintiff,

v.

WARNER BROS. ENTERTAINMENT INC.,

Defendant.

DC COMICS,

Third-Party Plaintiff,

v.

CHRISTOPHER WOZNIAK,

Third-Party Defendant.

Civil Action No. 22-cv-08969 (PAE)

**DECLARATION OF MATT REEVES IN  
SUPPORT OF WARNER BROS.  
ENTERTAINMENT INC. AND DC  
COMICS' MOTION FOR SUMMARY  
JUDGMENT**

I, Matt Reeves, declare as follows:

1. I am the writer, director, and producer of the motion picture *The Batman* (2022), which is the subject of Christopher Wozniak's claims against Warner Bros. Entertainment Inc. ("Warner Bros."), the Defendant in this suit. I submit this declaration based upon my personal knowledge in support of Warner Bros. and DC Comics' Motion for Summary Judgment.

2. I have been writing screenplays and making movies professionally since the late 1980s. Previous films I have written, directed, and/or produced include *Cloverfield* (2008), *Let Me In* (2010), *Dawn of the Planet of the Apes* (2014), and *War for the Planet of the Apes* (2017), among others. Additionally, I created the television series *Felicity* which aired from 1998-2002.

3. I have been making films in one form or another since a young age. I attended the University of Southern California's film school, where I continued writing and making films. While in college, I sold a number of options for scripts I wrote, and a screenplay I had written with a friend was bought by Warner Bros., which became the film *Under Siege 2: Dark Territory* (1995). In addition to completing my undergraduate degree in 1984, I also obtained a graduate degree from the University of Southern California School of Cinematic Arts in 1992.

4. The purpose of this declaration is to provide certain background about how I became the writer and director of *The Batman*, how the story for the film was conceived and written, as well as facts relating to certain claims and defenses alleged by the parties in this action.

#### Creation of *The Batman*

5. While I was in the process of finishing my directing work on *War for the Planet of the Apes*, Warner Bros. contacted my agent in January of 2017 about the possibility of my directing a Batman film that was currently in development at the studio. At the time, I was so busy with my other work that I initially resisted the idea of a meeting, but as a lifelong Batman fan, I couldn't help myself: I took the meeting.

6. In advance of the meeting, Warner Bros. sent me a pre-existing screenplay written by a writer named Chris Terrio and the writer and director Ben Affleck. Upon reading it, I determined that the story and resulting film was not a project that I felt I wanted to do; I

informed Warner Bros. that if the studio wanted to use this pre-existing script, it should use another director. I also told them an idea I had for an original Batman story that I conceived: a Batman detective story where solving the case led to discovering something unexpectedly personal for Batman. Warner Bros. liked the idea and hired me to make *The Batman*.

7. I started thinking more about the story and writing the screenplay for *The Batman* later in 2017, after I completed post-production for another film. I first pitched the story in conceptual form to Warner Bros. in the fall of 2017. For my story, I took inspiration from a variety of sources and genres when writing *The Batman*, including the real-world story of the Zodiac killer, 1970s noir film such as *Taxi Driver* and *Chinatown*, and my own familiarity with pre-existing Batman works of DC Comics (comics) and Warner Bros. (films and television series) including in particular Frank Miller's *Year One* comic which had a "cop movie" tone and focused on the relationship between Commissioner Gordon and Batman. I did not use any material from the previous script written by Chris Terrio or any other material provided by Warner Bros. other than the Batman characters and universe. Warner Bros. liked my story concept and I was instructed to get to work turning it into a screenplay.

8. I started working on the screenplay in the fall of 2017. At some point in the process, to make sure I could turn in a draft in the time requested by Warner Bros. and in part due to my writing process – I edit and revise extensively as I write, which leads to what I consider high-quality drafting but can take longer than usual for screenplay writing – I brought in a writer named Peter Craig as a partner on *The Batman*. Peter is an experienced screenwriter who has worked on such films as *The Town*, *The Hunger Games: Mockingjay (Parts I and II)* and others, and was suggested to me by a former writing partner.

9. When working with writing partners, it is my usual process to flesh out the story and write every word of every scene physically together with my partner. Peter and I wrote the parts of the screenplay for *The Batman* that we completed together following this process. Later in 2018, Warner Bros. requested to see a draft of the screenplay, which we had not yet finished, so Peter and I agreed to write a limited number of scenes separately. I eventually rewrote the scenes that Peter wrote on his own. Peter left the project in or around the end of 2018.

10. Again due to the timing and pace of my drafting, I determined that finishing the draft in a timely fashion required a writing partner. I asked Mattson Tomlin, a young writer I met through a prior project who I had mentored and worked with in the past, as a writing partner in or around the March of 2019 to help me finish the screenplay for *The Batman*. Mattson and I wrote every word he contributed to the screenplay together, either side-by-side, or virtually, through Zoom or a similar service.

11. Over the course of the time my partners and I spent writing the screenplay for *The Batman*, I had several meetings with executives at Warner Bros. (most notably Toby Emmerich, Geoff Johns, Walter Hamada and Chantal Nong as well as some others). At these meetings and at other times in the writing process, Warner Bros. executives provided feedback on my drafts (known as “notes” in the industry), *i.e.*, suggestions for refining particular scenes that my co-writers and I had already created. While I generally tried to address these notes in a way that made the Warner Bros. executives happy, I had complete discretion to take or leave notes or interpret them differently in a way that fit the story I wanted to tell. The only “pre-existing” material I received from them were a limited number of published Batman comic books, solely for the purpose of familiarizing me with the character’s background and his universe (though I already had a fairly good sense of this from my own experience), as well as a list of Batman’s

gadgets, which I could similarly decide to use (or not use) in the film. As a result, while some scenes and plot nuances were influenced by notes and materials I received from the studio, the story and screenplay for *The Batman* was created entirely by me with my writing partners.

12. I understand that Warner Bros. makes Batman films under an agreement with DC Comics, the publisher of Batman comics. I had no contact with personnel from DC Comics while writing the screenplay for *The Batman* and DC Comics had no control or direction over the creation of the screenplay or the film, nor did it contribute any creative material to the screenplay.

13. Nor have I met or had contact with an individual named Michael Uslan, who I understand received an Executive Producer credit on the film as a result of a deal made in the 1980s. Mr. Uslan had no involvement with the creation of the screenplay for *The Batman* or the production of the film itself.

Plot of *The Batman*

14. *The Batman* depicts Batman in his early days as a crimefighter, with his skills not yet developed in a manner familiar to film audiences. The Riddler leaves Batman a series of cryptic clues and puzzles contained in killings targeting the elite of Gotham, Batman's fictional home. Following this mystery leads Batman down a road of personal discovery and Batman encounters other well-known characters from his universe including Selina Kyle (Catwoman), Oswald "Oz" Cobblepot (The Penguin), and mobster Carmine Falcone. In investigating, he mistakenly comes to believe that the Riddler has uncovered his secret identity of Bruce Wayne, but this turns out to be wrong: the truth is that Batman's desire to find justice in an unjust world unintentionally inspired the Riddler to target the elite of Gotham who he considered corrupt (including Batman's alter ego, Bruce Wayne). The Riddler, through social media, in turn

radicalizes his followers to flood Gotham and attempt to assassinate Gotham's mayor-elect Bella Réal, leading to a confrontation between Batman and these followers in Gotham City Garden. After defeating the Riddler's followers and saving Réal, Batman vows to inspire hope in Gotham.

15. The film portrays a version of Gotham grounded in reality but with a horror-bend and features Hitchcock-inspired sounds and visuals that give the viewer a sense of being inside that world. For example, in depicting a car chase involving the Batmobile, the camera gives a point-of-view from the side of the Batmobile, creating an immersive experience (*i.e.*, the picture shakes during the chase and when driving through water, it would actually get on the camera lens). This style was important to me because I wanted to make a movie about Batman, a character that has been previously portrayed in a sort of fanciful way, that did not feel like a fantasy but rather was realistic and grounded.

Christopher Wozniak

16. In mid-2022, I became aware that the plaintiff in this action, Christopher Wozniak, was posting claims on the Internet that *The Batman* copied a story he claims to have written. I have never seen any story written by Mr. Wozniak nor have I ever met him. In fact, I had never heard of Mr. Wozniak prior to mid-2022, months after *The Batman* was released in theaters.

17. My first and only awareness of Mr. Wozniak prior to this lawsuit being filed was his posting of inflammatory content on social media about and directed at me regarding his claims. Despite having said nothing publicly to date about or in response to any of Mr. Wozniak has said online, as is clear from my statements above, I did not copy any part of his story when

conceiving of, writing and creating *The Batman*. Indeed, to this day, I have not even seen a copy of his story.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 10th day of November 2023 in Pasadena, California.



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Matt Reeves